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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of

Establishment of a Funding  
Mechanism for Interstate Operator  
Assistance for the Deaf

FEDERAL COMMUNICATIONS COMMISSION  
RM 8585 OFFICE OF SECRETARY  
Public Notice 52155

COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation (MCI), pursuant to FCC Public Notice No. 52155, issued February 14, 1995, respectfully submits comments on the Petition for Rulemaking submitted by Southwestern Bell Telephone Company (SWBT) to establish a funding mechanism to recover its costs for interstate operator assistance for the deaf (OAD). MCI opposes this petition for the reasons stated below.

SWBT explains that OAD is needed primarily when customers using text telephones (TT) to communicate with other customers using text devices want to bill a call to a line account different than the customer's billing number. Billing to another account requires assistance of operators to collect and validate billing information. SWBT notes that users of TTs may also use operator assistance services for functions such as directory assistance, assistance with receipt of recorded announcements, or credit for service difficulties.

SWBT states that AT&T has provided OAD for local, intraLATA and interLATA calls since divestiture but that it

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has informed SWBT that it will no longer provide OAD unless SWBT pays AT&T for these services.<sup>1</sup> SWBT has agreed to pay AT&T to maintain OAD services through mid-1995. SWBT claims that funding would ensure that OAD services continue into the future.

**II. MCI Opposes a Rulemaking to Establish a Subsidy Fund for Operator Assistance Services.**

SWBT has not provided any data to support its claim that a subsidy fund is necessary to continue these operator services. It has merely made a bald assertion that it wants a subsidy from interexchange carriers. The Commission cannot base a decision to create a subsidy fund on SWBT's unsupported assertion. It needs more information before it can institute a rulemaking. At a minimum, SWBT should be directed to submit data showing costs and revenues associated with these services, as well as the volume of calls that would be subject to any subsidy.

MCI believes that a subsidy fund is not needed for these services. There are alternative ways for SWBT to provide this service which would not require another subsidy from interexchange carriers. USWest has issued a Request for Proposals from other service providers in an attempt to

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<sup>1</sup> SWBT's premise that AT&T is the only provider of operator assistance for the deaf is incorrect. MCI also provides such services and others may also provide OAD. SWBT's petition may encourage these OAD providers to request a subsidy from SWBT for provision of these services.

more economically provide these services.<sup>2</sup> The RFP pertains to the kinds of services mentioned by SWBT, including directory assistance, bill to third number, calling card calls, emergency interrupt and credit requests. MCI suggests that SWBT might benefit from the creative thinking USWest applied in this case.

Therefore, MCI respectfully requests that the Commission deny SWBT's petition for rulemaking to create a subsidy fund for operator assistance for the deaf.

Respectfully submitted,

MCI Telecommunications Corporation

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Dated: March 16, 1995

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<sup>2</sup> See USWest Business Resources, Inc., Request for Proposals No. 4825\*1\*1, dated Nov. 8, 1994.

**CERTIFICATE OF SERVICE**

I, Vernell V. Garey, hereby certify that the foregoing "MCI COMMENTS" in RM 8585 were served this 16th day of March, 1995 were mailed first class, postage prepaid, to the following listed below:

  
Vernell V. Garey

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